



U.S. Department of Justice

Tax Division

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Via Email

Richard E. Lerner, Esq.
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Re: *United States of America v. Reyes, et al.*,
Case No. 1:21-cv-05578 (E.D.N.Y.)

Dear Mr. Lerner:

Pursuant to District Judge Brodie's individual Court rules, attached are copies of the following:

1. Notice of Plaintiff United States of America's Motion for Summary Judgment
2. Memorandum of Law in Support of Plaintiff United States of America's Motion for Summary Judgment
3. Statement of Undisputed Material Facts
4. Declaration of Julia M. Glen in Support of Plaintiff United States of America's Motion for Summary Judgment
5. Declaration of Deborah D. Cox in Support of Plaintiff United States of America's Motion for Summary Judgment
6. Declaration of Kimberly Nguyen in Support of Plaintiff United States of America's Motion for Summary Judgment
7. Proposed Judgment

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Sincerely yours,

/s/ Philip L. Bednar

PHILIP L. BEDNAR
JULIA M. GLEN
Trial Attorneys
Civil Trial Section, Northern Region

Enclosures: As stated.